

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS,
SCOTT TUROW, and RACHEL VAIL,
individually and on behalf of
others similarly situated,

Plaintiffs,

Case No. 1:23-cv-8292-SHS

v.

OPENAI INC., OPENAI OPCO LLC,
OPENAI GP LLC, OPENAI LLC, OPENAI
GLOBAL LLC, OAI CORPORATION LLC,
OPENAI HOLDINGS LLC, OPENAI
STARTUP FUND I LP, OPENAI STARTUP
FUND GP I LLC, OPENAI STARTUP
FUND MANAGEMENT LLC, and
MICROSOFT CORPORATION,

Defendants.

**AFFIDAVIT OF ANNETTE HURST IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

COUNTY OF SAN FRANCISCO)

):ss

STATE OF CALIFORNIA)

Annette Hurst, being duly sworn, deposes and says as follows:

1. I am a Partner with the law firm of Orrick, Herrington & Sutcliffe LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned action.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in

good standing of the Bar of the State of California.

4. There are no pending disciplinary proceedings against me in any State or Federal court.

5. I have not been convicted of a felony.

6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore I, Annette Hurst, respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this action for Defendant Microsoft Corporation.



Annette Hurst

Sworn to before me
this 18th day of December, 2023



Notary Public